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December 29, 2020

Via CM/ECF

Hon. Edward S. Kiel
Frank R. Lautenberg U.S. Post Office &
Courthouse Building
2 Federal Square, Courtroom 8
Newark, NJ 07102

Re: Blueprint Capital Advisors, LLC v. Murphy, et al., No. 20-cv-07663

Dear Judge Kiel:

Blueprint Capital Advisors, LLC (“BCA”) writes to respectfully request permission to file a single, consolidated opposition to the six applications to stay discovery filed by defendants Philip Murphy, State of New Jersey Division of Investment, Jason MacDonald, Christopher McDonough, Corey Amon, Dini Ajmani (collectively the “State Defendants”), Owl Rock Capital Corporation (“Owl Rock”), Timothy Walsh (“Walsh”), Cliffwater, LLC (“Cliffwater”), Samantha Rosenstock (“Rosenstock”), and BlackRock, Inc. and BlackRock Alternative Advisors (together “BlackRock”), with a page limit of 30 pages.

On December 18, 2020, the State Defendants, Owl Rock, Walsh, Cliffwater, Rosenstock, and BlackRock filed six separate applications to stay discovery, totaling 40 pages collectively. (ECF No.’s 89, 90, 91, 93, 94, 95.) Pursuant to Your Honors’ direction at the December 2, 2020 Status Conference, BCA is entitled to submit six separate letters in opposition not to exceed 10 pages each, with an aggregate page limit of 60 pages.

There is significant overlap in the facts and legal arguments BCA intends to present in opposition to the Defendants’ six applications. Accordingly, in the interest of judicial efficiency, BCA respectfully seeks leave to submit a single, consolidated opposition to the Defendants’ applications, with a page limit of 30 pages.

BCA has conferred with counsel for the State Defendants, Owl Rock, Walsh, Cliffwater, Rosenstock, and BlackRock, who have consented to BCA’s request.

Respectfully,

BROWN RUDNICK LLP

/s/ Lauren Tabaksblat
Lauren Tabaksblat

cc: All Counsel of Record (via CM/ECF)

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